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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

WALTER E. FORD,

Plaintiff,
v.

Case No. 18-cv-05101

COMPLAINT

**AECOM and
BECHTEL NATIONAL, INC.,**

JURY TRIAL DEMANDED

Defendant.

Plaintiff, through his counsel, alleges as follows:

I. NATURE OF THIS ACTION

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2 1. Plaintiff Walter E. Ford hereby brings this action based upon
3 retaliation against him by his employers in violation of the Energy Reorganization
4 Act, 42 U.S.C. § 5851, as amended.
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II. PARTIES

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7 1. Plaintiff Walter E. Ford is a United States citizen residing in the State of
8 Washington. Plaintiff was an employee at the Hanford Waste Treatment and
9 Immobilization Plant (WTP). Defendants Bechtel National, Inc., and AECOM
10 (formerly URS, Inc. d/b/a URS Energy and Construction, Inc.) employed Plaintiff.
11 Plaintiff was at the WTP project at the Hanford Site until his termination on
12 November 17, 2011.
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15 2. Bechtel National, Inc. (BNI) is a government contractor hired to design, build
16 and commission the Hanford Waste Treatment and Immobilization Plant, which is
17 intended to stabilize the radioactive and chemical wastes stored in underground
18 tanks at the Hanford Nuclear Site.
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20 3. AECOM acquired URS, Inc. ("URS") d/b/a URS Energy and
21 Construction, Inc.) in 2014. URS, Inc. was a partner and Principal Subcontractor
22 to Bechtel National, Inc. ("BNI") in a government contract to design, build and
23

1 commission the Hanford Waste Treatment and Immobilization Plant. URS (now
2 AECOM) functioned as a partner in profit-splitting with BNI and staffed key
3 positions. URS (now AECOM) earnings were a direct result of contract milestone
4 performance with BNI as judged by DOE rather than a typical subcontractor
5 payment schedule. The milestone performance includes both distinct milestones as
6 well as subjective judgments by the DOE in areas such as responsiveness and
7 percentage of work completed.
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10 4. At all times relevant to this complaint, BNI and URS (now AECOM) acted
11 as joint employers to Plaintiff Ford. Among other employer type tasks, BNI paid
12 Plaintiff, while BNI and URS (now AECOM) supervisors directed Plaintiff's
13 work. Defendant URS shared responsibility with Defendant Bechtel National for
14 operating the Waste Treatment Plant and Materials Handling Facility as well as
15 supervising the employees who worked there. Both Defendants participated in the
16 retaliatory scoring, rating, and ranking system that resulted in Plaintiff Ford's
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III. JURISDICTION, VENUE, AND EXHAUSTION

1. Jurisdiction lies in this Court pursuant to 42 U.S.C. 5851 (b)(4) as

1 Plaintiff filed his ERA complaint over one year ago, the Secretary has not issued a
2 written final decision, and there is no showing that such delay is due to the bad
3 faith of the Plaintiff.

4 2. Venue lies in this United States District Court under 28 U.S.C. §
5 1991(b) and (c) by virtue of the fact that the Defendant is regularly engaged in
6 business in this judicial district, the Defendants have offices located herein, and the
7 conduct complained of herein occurred and/or resulted in injury to the Plaintiff in
8 this judicial district.
9

10 3. Plaintiff has exhausted all administrative procedures required by law
11 on all of the claims for relief pleaded herein. On May 11, 2012, Plaintiff filed an
12 ERA retaliation complaint with OSHA as to the retaliatory actions against him that
13 form the basis of the actions alleged herein. On July 30, 2015, OSHA found in
14 Plaintiff's favor and ordered Defendant Bechtel to pay Plaintiff backpay,
15 compensatory damages, and attorneys fees. On August 28, 2015, Defendant
16 Bechtel filed a request for hearing before the Office of Administrative Law Judges.
17 The parties went to hearing on March 15-17, 2016. ALJ King held a
18 teleconference with the parties indicating he wished for more briefing on damages.
19 ALJ King left employment before issuing a written order. The DOL assigned a
20 new judge and new hearing date pursuant to Defendants' request for a new trial
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1 based on ALJ King's departure. Plaintiff filed his required 15-day advance notice
2 of intent to remove May 1, 2018.

3 4 **IV. GENERAL FACTS**

5 **The Hanford Site**

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7 1. The Hanford Nuclear Site ("Hanford"), is located in Washington State and is
8 a former nuclear weapons production facility. Since 1990, the DOE has been
9 dedicated to a clean-up mission to deal with the cold-war legacy of high-level
10 pollution on site. Hanford sits adjacent to the Columbia River and is home to 56
11 million gallons of hazardous high-level nuclear waste.

12
13 2. For more than forty years, reactors located at Hanford produced plutonium
14 for America's defense program. The process of making plutonium is extremely
15 "inefficient" in that a massive amount of liquid and solid waste is generated while
16 only a small amount of plutonium is produced. The DOE's mission is to ensure that
17 all of the facilities and structures that were associated with Hanford's defense
18 mission are deactivated, decommissioned, decontaminated, and demolished. Over
19 9,000 employees are currently employed at Hanford for that purpose.

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21 3. High-level nuclear waste, which is composed of chemical and radioactive
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1 waste ("high-level nuclear tank waste"), is currently stored in 177 large
2 underground tanks, all of which have exceeded their projected stable lifetime by at
3 least twenty years and a third of which are confirmed to have leaked into the
4 ground beneath the tanks. DOE estimates that approximately 1 million gallons of
5 high-level nuclear tank waste have leaked into the ground at Hanford. The
6 groundwater under more than 85 square miles of the Hanford site is contaminated
7 above current regulatory standards.
8

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10 **The Hanford Tank Waste Immobilization and Treatment Plant**

11 4. The cornerstone of the high-level nuclear tank waste cleanup project at
12 Hanford is the Hanford Tank Waste Treatment and Immobilization Plant ("WTP"),
13 also known as the "Vit Plant". The WTP will be an industrial complex of facilities
14 for separating and vitrifying (immobilizing in glass) millions of gallons of high
15 level nuclear tank waste. Vitrification technology involves blending the high-level
16 nuclear tank waste with glass-forming materials and heating it to over 2,000
17 degrees Fahrenheit. The mixture is then poured into stainless steel canisters to cool
18 and solidify. In this glass form, the high-level nuclear tank waste is considered
19 stable and impervious to the environment, and its radioactivity will dissipate over
20 hundreds or thousands of years.
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1 5. The five major components of the WTP will be: the Pretreatment Facility
2 for separating the high-level nuclear tank waste into the high level radioactive
3 waste stream and the low level stream, the High-Level Waste and Low-Activity
4 Waste facilities where the high-level nuclear tank waste will be immobilized into
5 glass, the Analytical Laboratory for providing chemical analysis for plant
6 operations and testing the quality of the glass, and the Balance of Facilities, which
7 will comprise several support facilities such as compressed air and treated water.
8

9 6. BNI-procured materials enter the WTP project through the Material
10 Handling Facility (MHF). The MHF receives and stores equipment and materials
11 that are to be used and installed in the WTP.
12

13 7. The WTP is currently one of the largest nuclear projects in the United
14 States and once complete, the WTP will be the largest facility of its kind in the
15 world. The DOE has regulatory oversight over the WTP and the MHF.
16

17 8. The original Bechtel cost estimate for the WTP was approximately \$5
18 billion and with a time estimate of seven years to complete it.
19

20 9. The current Bechtel cost estimate for constructing the WTP is over \$16.8
21 billion and the time estimate to complete it is nearly twenty years. Both cost and
22 schedule for the WTP have grown by over 240 percent.
23

1 10. Following the construction of the WTP and the commissioning of WTP
2 facilities and systems, the plant is planned to be fully operational by 2036 as
3 mandated by the Tri-Party Agreement.

4 11. The WTP is being built with a design life of forty years. There are parts
5 of the WTP that must operate for forty years with no maintenance including, for
6 example, tanks, pipelines, mixers in tanks, level control instrumentation, steam
7 spargers, and air system control devices.

8 12. The high-level nuclear tank waste in the Hanford waste tanks includes
9 plutonium and enriched uranium. A criticality accident occurs when a nuclear
10 chain reaction is accidentally allowed to occur in fissile material such as plutonium
11 and enriched uranium. This chain reaction releases radiation, which is highly
12 dangerous to personnel and could result in contamination of the surrounding
13 facilities and structures. When such incidents occur outside reactor cores and test
14 facilities where fission is intended to occur, they pose a high risk both of injury or
15 death to workers.

16 13. A criticality incident of sufficient magnitude could also damage the
17 facility and endanger the public.
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1 14. While the actual probability of a criticality may be low, the
2 consequences of a criticality would be significant. Consequences include
3 notification and reviews by state, federal, and international agencies, which could
4 result in a shutdown for an indeterminate period.
5

6 15. The hazardous high-level nuclear tank waste in the Hanford waste tanks
7 contains materials that constantly generate explosive hydrogen gas. The hydrogen
8 gas can become trapped and accumulate in the waste.
9

10 16. A combined criticality with explosive gas release at the WTP could be
11 an accident of the worst magnitude and could cause injury and death to workers as
12 well as endangering the public and the environment.
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14 **Plaintiff's Duties and Supervision**

15 17. Plaintiff Walter Ford is a Millwright who worked at the Hanford Site for
16 various contractors at Hanford since 1985, including Westinghouse and Fluor
17 Hanford, until his removal by Bechtel and URS in 2011. In October 2007, Plaintiff
18 was dispatched by the union as a Millwright for Defendants at the Waste
19 Treatment Plant at Hanford. As a Millwright for Defendants, Plaintiff worked in
20 preventative maintenance on the equipment that ultimately would be used in the
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1 WTP for the treatment of high-level radioactive waste. This equipment included
2 cranes and cables that would eventually lift high level waste loads.

3 18. This preventative maintenance is required by the Department of Energy
4 to ensure that when the equipment is in operation working with high-level nuclear
5 waste, it will operate as intended. Various DOE policies and procedures address
6 required preventative maintenance at the WTP and MHF.
7

8 19. In furtherance of the DOE's objective (and requirements) to insure
9 material and equipment are stored and maintained in proper working order for
10 when they are installed in processing high level radioactive waste, maintenance is
11 performed in accordance with a set of work instructions called work packages.
12 Depending on the task, a work package may be simple or complex but typically
13 includes a list of materials, equipment, steps and checklists to be used in
14 performing the maintenance work.
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17 20. "Pencil-whipping" was a practice that Defendant management pressured
18 employees to engage in with regards to the work packages. Pencil-whipping
19 involved employees simply checking off something as done in a work package
20 checklist, when in fact the step, task, or work was not actually performed.
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1 21. From 2007-April 2008, Plaintiff was supervised by General Foreman
2 Tom Silvers at the WTP. After reporting a concern regarding one of Tom Silvers'
3 subordinates who had injured a co-worker, Plaintiff was transferred to the MHF.

4 22. From April 2008-Spring 2009, Plaintiff Ford was at the MHF
5 supervised by Bechtel Craft Superintendent Darrel Bice.
6

7 23. In Spring 2009, the Bechtel supervisor in charge of the Material
8 Handling Facility, Darrel Bice, was replaced by Defendant URS manager, Steve
9 Bishop.
10

11 24. In May 2011, Plaintiff was removed from his foreman position
12 and moved back to the Waste Treatment Plant, where he reported to Foreman
13 Justin Rohrer who operated under URS supervisor John Gibson.
14

15 25. In September 2011, Plaintiff was reassigned to the on-site construction
16 crew where he worked under Foreman Mike Skeath and Supervisor Harold Maple.
17

18 26. John Gibson was one of a group of four supervisors who worked as a
19 group at the WTP construction site. The other three supervisors were URS
20 employees Steve Bishop, Mark Berkenbile, and Jason Cook. Justin Rohrer, James
21 Burks, Harold Maple, and Mike Skeath were all Bechtel National employees at the
22 time of Mr. Ford's rating, ranking, and layoff. Mr. Rohrer provided input to the
23

1 rankings that resulted in Mr. Ford's layoff and recommendations as to the
2 discipline for Mr. Ford that resulted in lowering his scores. Mr. Cook, Mr.
3 Berkenbile, Mr. Gibson, and Mr. Bishop were involved in determining the final
4 ratings and rankings of Mr. Ford and transmitting those to Mr. Burks for review.
5

6 **The History of WTP Hostile Work Environment Findings**

7 27. Defendants are contractors who have come under heavy criticism for
8 establishing and maintaining a retaliatory work culture. In January 2005, a
9 Department of Energy report documented the existence of a hostile working
10 environment at the Waste Treatment Plant. The investigation team interviewed
11 117 employees, and found "Greater than 50% of the workers interviewed believed
12 their job would be in jeopardy due to their participation in this inquiry. Most of the
13 interviewees mentioned other workers had issues but felt they could not risk their
14 employment by coming forward ... Roughly 20% voiced the belief that when
15 individuals raise safety concerns, those individuals are targeted for future lay-off
16 lists. Roughly 15% of the interviewees claimed there was fear of lay-offs for
17 workers who reported issues to Labor Relations or with the Employee Concerns
18 process."
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1 28. In September 2008, the DOE imposed a civil penalty for nuclear safety
2 violations against Defendant Bechtel National, Inc. based upon the findings of a
3 DOE hearing officer that a Bechtel engineer had been terminated after raising
4 nuclear safety concerns.
5

6 29. In an October 2010 review, the DOE Office of Health, Safety and
7 Security (HSS) examined the safety culture in the engineering division at the
8 Waste Treatment Plant, noting "Chilled Work Environment. Some individuals
9 within WTP believe that BNI management has created a "chilled" atmosphere that
10 discourages individuals from reporting safety concerns. Further, some individuals
11 expressed their belief that individuals who raise safety concerns could be subject to
12 retaliation, including the threat of losing their jobs. One of the most significant
13 concerns was subtle retaliation - i.e., that individuals who raise safety issues would
14 not be selected for new assignments as their current assignments are completed. . .
15 In this environment, a significant number of employees are understandably
16 concerned that a reputation as a "trouble maker" could adversely impact their
17 opportunities for continued or future employment. In addition, several
18 interviewees, including senior staff and managers, indicated that the situation
19 surrounding the individual who raised concerns to the DNFSB (prompting the
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1 request by EM to perform this review) contributed to a chilling effect that may
2 reduce their willingness to raise technical or safety issues. While some
3 organizations had a higher fraction of personnel with concerns than others, the
4 concerns about a chilled environment were not limited to a single organizational
5 element or job category."

7 30. On June 9, 2011, the Defense Facilities Nuclear Safety Board (DNFSB)
8 issued a letter to Energy Secretary Steven Chu, transmitting DNFSB
9 Recommendation 2011-1 to the Secretary of Energy, Safety Culture at the Waste
10 Treatment and Immobilization Plant. The Board wrote: "The Board finds that
11 expressions of technical dissent affecting safety at WTP, especially those affecting
12 schedule or budget, were discouraged, if not opposed or rejected without review.
13 Project management subtly, consistently, and effectively communicated to
14 employees that differing professional opinions counter to decisions reached by
15 management were not welcome and would not be dealt with on their merits.
16 There is a firm belief among WTP project personnel that persisting in a dissenting
17 argument can lead, as in the case of Dr. Tamosaitis, to the employee being
18 removed from the project or reassigned to other duties." As of the writing of this
19 finding, Dr. Tamosaitis sits in a basement cubicle in Richland with no meaningful
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1 work. His isolated physical placement by contractor management and the lack of
2 meaningful work is seen by many as a constant reminder of what management will
3 do to an employee who raises issues that might impact budget or schedule."

4 31. On January 11, 2012, the DOE's Office of Health, Safety and Security
5 released its HSS Report and Supplemental HSS Report. Some key findings from
6 the report included:
7

8 • " ... during the safety culture evaluation, a significant number of staff within
9 ORP, DOE-WTP, and BNI expressed reluctance to raise safety or quality
10 concerns for various reasons. Fear of retaliation was identified in some BNI
11 groups as inhibiting the identification of problems.

12 • "For example, 48 percent of the responding electricians disagreed or strongly
13 disagreed with a statement on the K-MR survey stating "I am confident that
14 the 'zero tolerance' policy against retaliation at WTP is enforced."

15 • "In this atmosphere, instances where individuals perceive that their concerns
16 about design questions are not listened to, that management does not want to
17 hear problems, that technical dissent is suppressed, and that blame is being
18 assigned unfairly are almost inevitable (for both Engineering and E&NS staff
19 members). The end result is that a significant number of staff either express a
20 general reluctance to raise issues or indicate perceptions of retaliation; the
21 situation is not consistent with a healthy safety culture."

22 • "ORP, DOE-WTP, and BNI management has not achieved timely resolution
23 of important issues, including those discussed above; in some cases, issues
24 have remained unresolved for about ten years."

25 • "Interviews with construction crafts personnel indicated a widespread
perception that the performance rating system ... is arbitrary and unfairly
implemented in a way that inhibits or penalizes the raising of safety and
quality issues."

1 • "... many crafts workers identified concerns about safety culture, including
 2 mistrust of the construction superintendents; frustration with inconsistent
 3 disciplinary actions and the craft rating system; fear of retaliation for raising
 4 safety issues; inconsistent application and communication of rules and
 5 procedures among WTP buildings; and inadequate planning, scheduling, and
 6 coordination of work."

7 • "Overall, only 0% of all survey respondents feel that they can openly
 8 challenge decisions made by management."

9 32. Bechtel has contract and legal obligations prohibiting retaliation against
 10 whistleblowers at Hanford. URS had contract and legal obligations prohibiting
 11 retaliation against whistleblowers at Hanford.

12 **V. FACTS REGARDING PROTECTED ACTIVITIES**

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 14 1. In 2004, Plaintiff Ford testified in a Department of Labor Energy
 15 Reorganization Act proceeding, *Cecil v. Fluor Hanford, Inc.* DOL OALJ Case No.
 16 2004-ERA-00011 (Aug. 16, 2006). At issue in *Cecil* was a dispute regarding a
 17 crane that was lifting highly radioactive materials. Plaintiff Ford testified that he
 18 shared Complainant Cecil's concern that the brake system had to be replaced, load
 19 tested, and recertified, contrary to management's attempts to only try to repair the
 20 brakes that were in place. Plaintiff Ford also testified about hostile comments he
 21 heard regarding Mr. Cecil not being able to keep his mouth shut about safety. The
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1 Administrative Law Judge ruled in favor of Complainant Cecil in 2006.

2 Knowledge of this complaint and Mr. Ford's involvement in it was spread widely
3 through the Hanford Site.

4 2. In 2005, Plaintiff filed a retaliation complaint under the Energy
5 Reorganization Act against Hanford employers Energy Northwest, Inc., and
6 Battelle National Labs because of concerns he had that he was being blacklisted by
7 Hanford area employers due to his Department of Labor testimony in 2004.

8 3. In October 2007, Plaintiff was dispatched by the union as a millwright for
9 Defendants at the Waste Treatment Plant at Hanford. In April 2008, Plaintiff Ford
10 reported to BNI management safety concerns he had regarding lapses in following
11 company and DOE mandated safety rules, policies and procedures at the
12 workplace, including a millwright purposely trying to eject a fellow employee
13 from a golf cart which caused her injury; and another occasion of horseplay by the
14 same millwright causing a large brass hook to fall from 30 feet above to the feet of
15 an employee below. Plaintiff also reported that he had received reports a manager
16 expressing his desire to not work with Plaintiff because he was a "whistleblower".
17 Plaintiff's report resulted in a company investigation. After his reports, Plaintiff
18 was then transferred to the Material Handling Facility (MHF).
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1 4. In April 2008, Plaintiff Ford reported possible blacklisting by nuclear
2 fuel company AREVA (now Orano USA) to the U.S. Department of Labor.
3 AREVA provided various services related to nuclear energy, including cleanup and
4 closure.
5

6 5. In 2009, Plaintiff started a Safety Council for the Materials Handling
7 Facility, where employees could seek resolution to various safety concerns and
8 where Plaintiff and members could seek to improve the MHF safety culture.
9 Plaintiff wrote the MHF Safety Council Standard Implementation Procedures. As
10 of May 2009, Plaintiff had been elected Chair of the MHF Safety Council.
11

12 6. Through 2010-2011, Plaintiff raised and pursued several issues both on
13 his own behalf on and on behalf of other employees involving Defendants'
14 operations. He raised concerns both through and outside the MHF Safety Council.
15 Not all of Mr. Ford's concerns were recorded in the MHF Safety Council Meeting
16 Minutes, but a number of important concerns he raised or participated in in 2010-
17 2011, including resolution of a radiological alarm and concerns over flashback in
18 weed burners, were recorded in said Minutes and circulated throughout the
19 worksite. He also reported: crane maintenance safety issues related to rust, lifting
20 cables and required maintenance, optical tooling safety issues, specific ecosystem
21 plume alarms while working at MHF, safety issues related to confusing language
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1 code used over radio system to alert work force to potential hazards and dangers at
2 Hanford, and storage equipment safety issues.

3 7. In January 2010, Plaintiff Ford complained to the Nuclear Regulatory
4 Commission about concerns he had about ongoing blacklisting at the Columbia
5 Generating Station.
6

7 8. In January 2011, Plaintiff Ford questioned the procedure regarding back
8 flow arrestors in the “weed burners” propane tank and ultimately along with the
9 Safety Council suggested to err on the side of safety and install flashback arrestors
10 on heat shrink guns and portable propane heaters.
11

12 9. At various times throughout 2011, Plaintiff objected to Bishop’s pressure
13 to pencil whip packages, and informed Bishop that he would not skip the steps
14 mandated by the work packages. Plaintiff similarly objected to Foreman Rohrer
15 about skipping work package steps and not properly cleaning equipment.
16 Plaintiff’s reputation around the work site was that he would not skip work
17 package steps like other employees.
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20 **VI. FACTS REGARDING ADVERSE ACTIONS**

21 1. At various times during his employment, Bechtel and URS managers
22 and employees warned others about working with Plaintiff Ford, warned others
23 about letting Plaintiff Ford see them work, or expressed a desire to not work with
24

1 him because he was a “whistleblower” or “caused trouble” for others. He was
2 called a “pot stirrer” to his colleagues. His reputation as a whistleblower was
3 widely circulated throughout the WTP and MHF work sites.

4 2. Throughout his time at MHF, Defendant URS manager, Steve
5 Bishop’s demeanor and attitude towards Plaintiff grew increasingly hostile. At
6 various points, Mr. Bishop brought in work crews to do work packages when
7 Plaintiff refused to skip steps mandated within them.
8

9 3. In May 2011, Plaintiff was removed from his foreman position
10 and moved back to the Waste Treatment Plant, where he reported to Foreman
11 Justin Rohrer and was retaliatorily singled out for repeated discipline.
12

13 4. Defendants ultimately retaliated against Plaintiff by terminating him
14 in a layoff on November 17, 2011.
15

16 **VI. CAUSES OF ACTION**

17 1. Defendants’ managers knew of Plaintiff’s ERA-protected activities
18 including testifying in actions before the Department of Labor, bringing complaints
19 to the DOL and NRC on his own behalf, and raising and escalating nuclear safety
20 related concerns to management in 2008-2011, within and outside of the MHF
21 Safety Council.
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1 2. Defendants have engaged in the above hostile work environment, and the
2 indicated pattern of reprisal and discrimination against employees who raise
3 concerns generally, and Plaintiff specifically. They took discrete acts against
4 Plaintiff in whole or in part due to his protected activity.
5

6 3. Plaintiff's termination on November 17, 2011, was in reprisal for
7 Plaintiff's protected activities and in violation of the Energy Reorganization Act.
8

9 **VI. REQUEST FOR RELIEF**

10 1. Plaintiff respectfully requests the following relief:

- 11 a. affirmative action in the way of declaratory relief be afforded Plaintiff
12 directing the institution of safety-committed work environment, free from
13 retaliatory animus;
14 b. an Order reinstating Plaintiff to his former position as Millwright;
15 c. back pay for lost wages and overtime as a direct result of the Defendant's
16 retaliatory actions, with interest;
17 d. restoration of any and all benefits that would have accrued to Plaintiff but
18 for Defendant's retaliatory actions, including but not limited to any health
19 care benefits, reinstatement of pension benefits and 401K retirement
20 benefits;
21 e. an award of damages to compensate Plaintiff for emotional distress and the
22 infliction of pain and suffering, in an amount to be determined by a jury but
23 not less than \$500,000;
24 f. an exemplary award of damages;

- 1 g. prominent posting of the order granting relief to Plaintiff throughout the
2 plant, with instructions to all Hanford employers to distribute the order to all
3 personnel;
4 h. upon reinstatement, affirmative actions to abate the hostile working
5 environment, including an Order to enjoin unlawful employment actions and
6 to provide triple damages against Defendant for engaging in discrimination
7 or committing acts of reprisal against employees who engage in protected
8 activity;
9 i. all costs for bringing this action, including attorney fees and litigation costs;
10 j. any and all such other relief in law or in equity to which Plaintiff may be
11 entitled.

12 Respectfully SUBMITTED this 15th day of June, 2018:

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